

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

BIG LOTS, INC., *et al.*,

Debtors.¹

Chapter 11

Case No. 24-11967 (JKS)

(Jointly Administered)

Re: D.I. 1351

**CERTIFICATION OF COUNSEL REGARDING BRIDGE ORDER (I) EXTENDING
TIME TO ASSUME OR REJECT UNEXPIRED LEASES OF NONRESIDENTIAL
REAL PROPERTY AND (II) GRANTING RELATED RELIEF**

The undersigned counsel to the above-captioned debtors and debtors in possession (the “**Debtors**”) hereby certifies as follows:

1. At the hearing held on December 31, 2024, the Debtors made an oral motion for a bridge order extending within which the Debtors must assume or reject their unexpired leases (the “**Assumption or Rejection Deadline**”) from January 7, 2025, through and including January 21, 2025. The Court requested that the Debtors file a proposed order granting the oral motion under a certification of counsel.

2. To that end, attached hereto as **Exhibit A** is a proposed order extending the Assumption or Rejection Deadline through and including January 21, 2025.

3. The Debtors provided the proposed bridge order to (a) counsel to the Official Committee of Unsecured Creditors, (b) counsel to certain landlords represented by Ballard

¹ The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors’ corporate headquarters is 4900 E. Dublin-Granville Road, Columbus, OH 43081.

Spahr LLP (the “**Ballard Spahr Landlords**”), (c) counsel to certain landlords represented by Saul Ewing LLP, and (d) counsel to certain landlords represented by Offit Kurman, each of whom confirmed their consent to entry of the proposed bridge order. In addition, counsel to the Ballard Spahr Landlords relayed to the Debtors that certain landlords represented by Allen Matkins Leck Gamble Mallory & Natsis LLP also consent to entry of the proposed bridge order. Finally, the Debtors also provided the proposed bridge order to counsel to certain landlords represented by (x) Fox Rothschild and (y) Bayard, P.A., who did not respond.

WHEREFORE, the Debtors respectfully request entry of the proposed bridge order attached hereto as **Exhibit A** at the Court’s earliest convenience.

[Signature page follows]

Dated: January 2, 2025
Wilmington, Delaware

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Sophie Rogers Churchill
Robert J. Dehney, Sr. (No. 3578)
Andrew R. Remming (No. 5120)
Daniel B. Butz (No. 4227)
Sophie Rogers Churchill (No. 6905)
Casey B. Sawyer (No. 7260)
1201 N. Market Street, 16th Floor
Wilmington, DE 19801
Tel: (302) 658-9200
rdehney@morrisnichols.com
aremming@morrisnichols.com
dbutz@morrisnichols.com
srchurchill@morrisnichols.com
csawyer@morrisnichols.com

-and-

DAVIS POLK & WARDWELL LLP

Brian M. Resnick (admitted *pro hac vice*)
Adam L. Shpeen (admitted *pro hac vice*)
Stephen D. Piraino (admitted *pro hac vice*)
Jonah A. Peppiatt (admitted *pro hac vice*)
Ethan Stern (admitted *pro hac vice*)
450 Lexington Avenue
New York, NY 10017
Tel.: (212) 450-4000
brian.resnick@davispolk.com
adam.shpeen@davispolk.com
stephen.piraino@davispolk.com
jonah.peppiatt@davispolk.com
ethan.stern@davispolk.com

Counsel to the Debtors and Debtors in Possession